

## *CalARP Program Sites*

*California Accidental Release Prevention Program*

*Mark McCabe, Environmental Health Specialist III  
Department of Environmental Health  
Hazardous Materials Division*



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## *Why a CalARP Program?*

Section 112 (r) of the  
Federal Clean Air Act  
(42 U.S.C. Section 7412 (r))

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## *Ca Health and Safety Code (HSC) 25531-25543.3*

- Law: Chapter 6.95, Article 2 of the California H&SC
- Regulations: Title 19, Div. 2, Chapter 4.5 of the California Code of Regulations

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## So When is a Facility Subject to CalARP?

- When it exceeds the Threshold Planning Quantity (TPQ) for a Regulated Substance in a Stationary Source

### Regulated Substances are listed in Section 2770.5, Title 19

- **Table 1** Federal TPQs
- **Table 2** Federal Flammable Substances TPQs
- **Table 3** CA State Regulated TPQs

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### *Table 1*

#### **77 Toxic chemicals**

TPQs between  
500 lbs and 20,000 lbs.

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### *Table 2*

#### **62 Flammable gases and volatile flammable liquids**

All TPQs are at 10,000 lbs.

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*Table 2 Exclusions*

Flammable substances used as a fuel or held for sale as a fuel at a retail facility.

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*Table 3*

**302 Toxic chemicals**  
Common chemicals seen include ammonia with a TPQ of 500 lbs

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**Regulated Substances are not the same as extremely hazardous substances!**

- Extremely Hazardous Substances are **356** chemicals listed in Section **313** of the Emergency Planning and Community Right-to-Know Act (EPCRA).
- Must report chemicals over the Threshold Planning Quantity (*sounds familiar?*).

**EPCRA Hotline 1-800-424-9346**

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Any Questions on when a facility is in the CalARP Program?

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How do you know if you have 500 lbs of ammonia?

1. First some basics:
  - 20% aqueous ammonia has a specific gravity of 0.93
  - Water has a specific gravity of 1 and weighs 8.33 lbs/gal
  - Aqueous ammonia weighs  $0.93 \times 8.33 \text{ lbs/gal} = 7.75 \text{ lbs/gal}$
2. Now some algebra:  $500 \text{ lbs} = 7.75 \text{ lbs/gal} \times (?)$
3.  $500 \text{ lbs} / 7.75 \text{ lbs/gal} = 7.75 \text{ lbs/gal} / 7.75 \times (?)$
4.  $64 \text{ gal} = (?)$
5.  $64 \text{ gal} \times 5 = 320 \text{ gallons}$

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*A bit more about the CalARP Program*

Three Programs:

- Program 1
- Program 2
- Program 3

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## Program 1

- No accidental release of a regulated substance within the past 5 years resulting in death, injury, significant environmental damage.
- No public receptors within the worst case toxic end point.
- Emergency response procedures have been coordinated with local emergency responders.

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## Program 3

- Specific manufacturing SIC Code
- Subject to OSHA Process Safety Management regulations
- The Administering Agency (AA) determines that the regulated substance poses a significant enough threat to warrant program 3 requirements

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## Program 2

A regulated process that  
**does not meet the  
requirements for  
programs 1 or 3**

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## What is required for the different Programs?

- **Program 1**

1. Worst Case release scenario
2. Five year accident history
3. Coordination with local emergency responders
4. RMP certification by a responsible party and submitted to the AA

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## What is required for the different Programs?

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## Program 2

- Implement a CalARP Management System
- Conduct a Hazard Assessment
- Meet the specific Program 2 Prevention Program Elements
- Develop and implement an Emergency Response Program
- Submit a completed Risk Management Plan to the AA

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## Program 3

- Develop and implement a CalARP Management System
- Conduct a Hazard Assessment
- Implement the Program 3 Prevention Requirements
- Develop an Emergency Response Plan
- Submit a completed RMP to the AA

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## What needs to be included in a Risk Management Plan?

- RMP Executive Summary
- RMP Management System
- Offsite Consequence Analysis (OCA)
- Five year Accident History
- Program 2 or 3 Prevention Program
- Emergency Response Program

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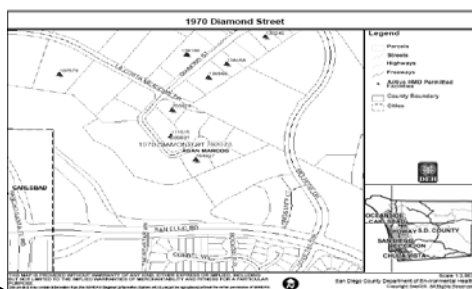
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## Offsite consequence analysis



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### Common CalARP Violations

- **Updates to the program**
  1. Hazard analysis every five years
  2. Public document every five years
  3. Required training every three years
  4. Emergency contact, hazard analysis, OCA, Program level, incident changes

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### Documentation

- Operating procedures  
(Program 3 annual certification)
- Maintenance records
- Training records
- Contractors
- Hot work

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### Emergency Response Plan

- Emergency equipment not maintained
- Emergency contact telephone numbers not current
- No coordination with the local emergency responders

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## Route 105

- Covers the entire County (Jumbo District)
- All six CUPA programs
- Much time with document review
- Countless letters to document the document approval process
- Different agencies in different counties

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## Any Questions?

- John Kolb 619-338-2472  
[john.kolb@sdcounty.ca.gov](mailto:john.kolb@sdcounty.ca.gov)
- Mark McCabe 619-338-2453  
[mark.mccabe@sdcounty.ca.gov](mailto:mark.mccabe@sdcounty.ca.gov)
- Website  
<http://www.sdcdeh.org>



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